



## **The Langstane Group**

### **Anti Bribery Policy**

Date approved by Senior Management Team	27 June 2019
Board of Management / Committee	15 July 2019
Approval date	15 July 2019
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Review date	15 July 2022
Version	V2

<b>Version</b>	<b>Date Approved</b>	<b>Changes</b>
V1	2014	
V2	15 July 2019	Re-write

## 1. Introduction

Langstane Housing Association is a Co-operative and Community Benefit Society and a registered social landlord with charitable status.

The Langstane Group (The Group) consists of Langstane Housing Association Limited, and its wholly owned subsidiaries. This policy applies to the Langstane Group.

The Group is committed to the highest standards of ethical conduct and integrity in all its activities. It is committed to the prevention, deterrence and detection of bribery and will not condone giving or taking bribes by any person connected with the organisation or its services.

## 2. Aims and Objectives of the Policy

The objective of this policy is to ensure compliance with the Bribery Act 2010 across the Langstane Group.

## 3. Links to other strategic documents and policies

The Group's Anti-Bribery Policy is linked to a number of strategic documents and policies in particular but not solely:

- Staff Handbook
- Code of Conduct (Staff and Board of Management)
- Entitlements Payments and Benefits Policy
- Whistleblowing Policy
- Privacy Policy
- Risk Management Policy
- Financial Regulations
- Scheme of Delegation
- Standing Orders
- Treasury Management Policy

## 4. Policy Statement

This policy outlines the Group's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010 and applies to all employees of the Group, tenants, Board Members or associated persons including agency or temporary workers, contractors, consultants or suppliers.

The policy requires that all employees, board members and associated persons comply with this policy and act honestly, responsibly and with integrity and safeguard and uphold the Group's core values.

## 5. Policy

5.1. The Group will comply with the Bribery Act 2010 as a part of everyday business.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the intention of:

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- inducing or rewarding improper performance of a function or activity or knowledge or;
- belief that accepting such a reward would constitute the improper performance of such a function or activity

A 'relevant function or activity' includes business activities or any other activity performed in the course of a person's employment or engagement as a temporary worker, consultant, contractor where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

5.2. This policy prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. This includes cash, a gift or other inducement made to gain personal, commercial, regulatory or contractual advantage.

In particular, it is unacceptable to:

- give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure;
- accept payment from a tenant or prospective tenant that you know or suspect is offered with the expectation that they will receive an allocation of housing or other benefit in return;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by you in return
- retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity in breach of this policy

### 5.3. Gifts and Hospitality

Employees will be aware of the Entitlements, Payments and Benefits Policy and the requirement to record any gifts or hospitality in line with that policy. The Group requires that any gifts or hospitality are managed and recorded very carefully to ensure the highest level of probity.

### 5.4. Charitable Donations

The Group recognises that charitable donations (both received and given) form part of its wider commitment and responsibility to the communities where it operates. Where a donation is given or received clear authorisation and recording is required.

### 5.5. Raising a Concern / Reporting Bribery

The Group's Whistleblowing Policy enables staff or Board Members or any associated person to raise concerns relating to conduct which they believe to be improper, illegal or immoral. All suspicions of bribery should be reported in accordance with the Whistleblowing Policy.

In particular employees and associated persons are required to report:

- requests for cash payments;
- requests for unusual payment arrangements, for example via a third party;
- requests for reimbursements or unsubstantiated or unusual expenses or a lack of standard invoices and proper financial practices

Notwithstanding the reporting requirements of the Whistleblowing Policy any suspected or detected bribery should be reported to the Chief Executive Officer at the earliest opportunity.

Depending on the nature of the bribery or suspected bribery, it may be appropriate or necessary to report the incident to the Group's regulatory bodies.

## **6. Breach of Policy**

Failure to comply with this policy will result in damage to the reputation of the Group and sector as a whole. The Group may face criminal liability, under the Act, for unlawful actions taken by employees, Board Members or associated persons. If convicted, the Group could receive an unlimited fine and potentially be excluded from tendering for public contracts. Individuals could be liable on conviction to imprisonment for up to 10 years.

A breach of any provision of this policy will constitute a disciplinary offence and will be dealt with in accordance with Langstane Housing Association's disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal. As far as associated persons are concerned, a breach of this policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

## **7. Risk Management**

The Group will reduce the risk of bribery by ensuring that the proper checks and balances are in place including strict adherence to Financial Regulations, authorisation levels and the Scheme of Delegation.

## **8. Monitoring and review**

The policy will be monitored and reviewed on a regular basis by the Director of Finance and Corporate Services who has a responsibility for ensuring compliance. Regular updates will be provided to the Board of Management who has overall responsibility for ensuring this policy complies with the Group's legal and ethical obligations.

The Group will provide training to all employees to help them understand their duties and responsibilities under this policy.

## **9. Equality and diversity**

The Langstane Group / Langstane Housing Association is committed to promoting equality and diversity across all areas of work. Discrimination or harassment of any kind is not tolerated.

## Right to complain

In the event you are not satisfied with the service you have received, please contact the Association for a copy of the Complaints Policy. This can also be viewed on Langstane Housing Association's website – [www.langstane-ha.co.uk](http://www.langstane-ha.co.uk)

If you would like this document sent to you in large print, please contact Support Services on 01224 423000